

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

JUL 18 2017

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

ROBERT SHANE APGAR,

Defendant.

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY Nadine Rose DEPUTY

Case No. CR 17-138

Violations:

18 U.S.C. § 844(e)
18 U.S.C. § 2251(a)
18 U.S.C. § 2251(e)
18 U.S.C. § 2252(a)(1)
18 U.S.C. § 2252(b)(1)
18 U.S.C. § 2252(a)(4)(B)

INDICTMENT

The Federal Grand Jury charges:

COUNT 1
(Bomb threat)

On or about December 1, 2015, in the Western District of
Oklahoma and elsewhere,

----- ROBERT SHANE APGAR, -----

the defendant, through an instrument of interstate and foreign commerce,
namely, the Internet, and in and affecting interstate and foreign commerce,
maliciously conveyed false information knowing the same to be false,
concerning an attempt and alleged attempt being made and to be made to
unlawfully damage and destroy any building, namely, the Grady County

Courthouse, by means of an explosive.

All in violation of Title 18, United States Code, Section 844(e).

COUNT 2
(Attempted sexual exploitation of children)

On or about October 19, 2015, in the Western District of Oklahoma and elsewhere,

----- **ROBERT SHANE APGAR,** -----
the defendant, attempted to persuade, induce, and entice a minor to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3
(Transportation of child pornography)

On or about October 19, 2015, in the Western District of Oklahoma and elsewhere,

----- **ROBERT SHANE APGAR,** -----
the defendant, knowingly transported and attempted to transport, using any

means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce one or more visual depictions, the production of which involved the use of a minor engaging in sexually explicit conduct, and such visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

COUNT 4
(Possessing or accessing child pornography)

Between on or about October 22, 2015, and on or about October 29, 2015, in the Western District of Oklahoma,

----- **ROBERT SHANE APGAR**, -----
the defendant, knowingly possessed and accessed with intent to view a computer and other matter that contained one or more visual depictions that had been transported using a means and facility of interstate and foreign commerce, and which were produced using materials which had been so transported, and such visual depictions involved the use of a minor engaging in sexually explicit conduct, and such visual depictions were of such conduct.

All in violation of Title 18, United States Code, Section
2252(a)(4)(B).

A TRUE BILL


FOREPERSON OF THE GRAND JURY

MARK A. YANCEY
United States Attorney


BRANDON HALE
Assistant U.S. Attorney